

**IN THE UNITED STATES DISTRICT COURT FOR
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAREN KILGO ROBINSON,

Defendant.

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Case No. 2:06-cr-0223-MEF

MOTION TO ALLOW DEFENDANT HOSPITAL VISITATION

COMES NOW, the defendant, Karen Kilgo Robinson, by and through the undersigned attorney, Richard K. Keith, and moves this Honorable Court allow her to visit her mother in the Critical Care Unit in the Decatur General Hospital in Decatur, Alabama.

As grounds in support thereof, the following is stated:

1. The defendant has contacted the undersigned to explain that her mother has been hospitalized over the weekend in Decatur, Alabama
2. The defendant desires to travel to Decatur, Alabama to be with her mother, who is in stable but critical condition, at the Decatur General Hospital.
3. The defendant has been compliant with her electronic monitoring since her pretrial release on September 22, 2006.
4. Attached as EXHIBIT A is correspondence from the defendant confirming and documenting the situation.

WHEREFORE, premises considered, the defendant moves this Honorable Court to allow her travel to Decatur, Alabama to spend time with her ill mother during her hospital

stay.

Respectfully submitted this 22nd day of January, 2007.

s/ Richard K. Keith
RICHARD K. KEITH (KEI003)
Attorney for Defendant
KEITH & DUBIN, PC
22 Scott Street
Montgomery, AL 36104-4012
Telephone: (334) 264-6776
Facsimile: (334) 265-5362

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Verne Speirs, AUSA
Post Office Box 197
Montgomery, AL 36101-0197

s/ Richard K. Keith
OF COUNSEL

Exhibit A

Glenna Ryals

From: Richard Keith
Sent: Monday, January 22, 2007 12:51 PM
To: Glenna Ryals
Subject: FW: Letter of Request from Karen Robinson

From: Kagr33@aol.com [mailto:Kagr33@aol.com]
Sent: Monday, January 22, 2007 12:45 PM
To: Richard Keith
Subject: Re: Letter of Request from Karen Robinson

January 22, 2006

Attn: Richard Keith
Attorney at Law

Mr. Keith,

My mother Sarah Kilgo was rushed to Decatur General Hospital in Decatur, Ala on January 21, 2006. She was admitted to the hospital to the Critical Care Unit in Critical Condition. I spoke with one of her nurses (James) and he stated her condition is somewhat stable but very Critical she is having respiratory failure and is on a ventilator she is not breathing on her own and the Cardiologist is very concerned about her heart rhythm and the fluid in her lungs. The doctors are doing all they can for her but have stated to my brother that her condition is very serious and very Critical at this point and does my mother have a living will. My father has passed on and my youngest brother recently passed on in May of 2006. My mother and older brother are the only 2 surviving relatives in my immediate family and they both live in Decatur, Al. My mother is 70 years old and has not been in good health she has had a lot of worry and grief come upon her. She lost her husband then the wife of my just recently passed brother committed suicide and then my brother had a heart attack and passed in May and with the arrest of my husband and I she has worried with that situation too so please I'm requesting clearance and understanding at this time to please go see my mother. Below is contact information as needed. I will either stay at my mother's, brother's or aunt's house. Thank you for your understanding.

Mother: Sarah Kilgo
407 William St. Sw.
Decatur, Al. 35601
(256) 353-9079
Currently admitted to The Critical Care Unit at Decatur General Hospital in Decatur, Al.
Hospital Phone Number (256) 341-2000 (ask for CCU)

Brother: Richard Kilgo
2012 College St. Se.
Decatur, Al.
Home Phone Number with answering machine
(256) 350-1892
(He will probably be in and out and at the hospital)

Aunt: Kathy Compton
303 Blackberry Dr.
Decatur, Al.

1/22/2007

(256) 340-0038

Karen Kilgo Robinson
1708 Formosa Ct.
Deatsville, Al.
(334) 361-2494
Cell (334) 558-1077

Sincerely,

Karen Kilgo Robinson

1/22/2007